

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
CASE NO.: 25-cr-60128-WPD

UNITED STATES OF AMERICA,
Plaintiff,

vs.

CHAD ANTHONY CLARK,
Defendant.

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UNOPPOSED MOTION FOR CONTINUANCE OF THE SENTENCING HEARING

COMES NOW the Defendant, Chad Anthony Clark, and files this Motion for Continuance of the Sentencing Hearing, and in support thereof, states:

1. On May 12, 2025, Mr. Clark was arrested in the above-referenced cause. [D.E. 1]
2. On June 5, 2025, a Grand Jury returned an Indictment charging him, and five (5) others as follows: count one (1) Conspiracy to Possess with Intent to Distribute and Distribute a Controlled Substance, in violation of 21 U.S.C. § 846; count eight (8), ten (10) and eleven (11) Distribution of a Controlled Substance, in violation of 21 U.S.C. § 841(a)(1).¹ [D.E. 53]
3. On September 19, 2025, Mr. Clark entered a plea of guilty as to count one (1) of the Indictment. [D.E. 126]
4. On November 5, 2025, the draft disclosure of Mr. Clark's Presentence Investigation Report (PSR) was filed; it calculated Mr. Clark's total offense level to be a 31 and his criminal history category to be a six (6), as a career offender pursuant to § 4B1.1(b), yielding a sentencing guideline range of 188-235 months. [D.E. 149]

¹ Mr. Clark is not charged in counts two (2) through seven (7), nine (9), or twelve (12) and thirteen (13).

5. The sentencing in this case is currently set for December 9, 2025, at 1:15 PM. [D.E. 126].
6. Undersigned counsel is requesting the reports and judgments associated with the cases that contribute with Mr. Clark's criminal history score; the requests have to be made in several jurisdictions and responses remain pending and additional time is needed for those responses.
7. Further, undersigned counsel intends on respectfully seeking an Order from this Court for expert costs to assist in presenting mitigation to the Court; said request is unopposed by the Government.
8. Said expert is currently pending approval for entry into FDC, where Mr. Clark is currently incarcerated. Additional time is needed for that expert to be approved, to complete her evaluation of Mr. Clark, and provide an opinion, if Mr. Clark's request for expert costs is approved.
9. Lastly, since the sentencing was set, Counsel was in litigation in other cases and was delayed preparing for this sentencing.
10. A continuance would not prejudice Mr. Estrada Claro or the United States.
11. This Motion is not made for the purposes of delay and will not cause prejudice or undue burden.
12. Undersigned counsel has conferred with counsel for the United States, who has no objection to a continuation of the sentencing hearing to accommodate undersigned counsel's request.
13. It is respectfully requested that Mr. Clark's Sentencing hearing be continued for, at least, thirty (30) days to January 9th, 12th, or 13th, 2026. It is further respectfully requested that the Sentencing hearing not be set January 14-21, 2026, or February

3-16, 2026, as undersigned counsel has previously scheduled, non-cancelable, non-refundable personal obligations.

Accordingly, the parties respectfully request a continuation of the memorandum deadline and sentencing hearing.

Respectfully submitted,

/s/ Dianne E. Carames
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CERTIFICATE OF SERVICE

I hereby certify that on November 17, 2025, undersigned electronically filed the foregoing document with the Clerk of the Court using CM/ECF which will send notification of such filing the United States Attorney's Office, Southern District of Florida.

/s/ Dianne E. Carames
Dianne E. Carames